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ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
Division of Air Pollution Control--Field Operations Section

MEMORANDUM

DATE: September 21, 1984 Date of Inspection: September 13, 1984
TO: Sy Levine, Mgr., Region 1 I.D.#: 031 600 ASD
FROM: *Hari Narayan* *HN* Region: 1 District: 4
SUBJECT: Facility: Acme Barrel Company
Address: 2300 W. 13th Street, Chicago, IL 60606
Contact/Title: Arnie Nehra/Project Engineer Phone: _____

A follow-up inspection of the above facility was conducted on September 13, 1984 accompanied by Kerry Keller to determine their drum burning incinerator's compliance status with Illinois Air Pollution Regulations.

During past investigations the facility's drum burning incinerator, on numerous occasions was observed to be in violation of Illinois Air Pollution Regulations. As part of the efforts for compliance with the Illinois Air Pollution Regulations the Company decided in 1983 to upgrade the incinerator operations. The improvements involved interlocking the drum conveyor chain speed and incinerator exhaust dampers to the temperature of the afterburner. The exhaust gas damper is regulated to provide proper resident time for combustion and the drum conveyor speed is regulated to prevent overloading of the incinerator system. In addition the upgrading involved installation of temperature monitor and chart recorder and a vestibule at the entrance of the incinerator. The facility was granted a variance by the Pollution Control Board to conduct the necessary upgrading of the drum incinerator and to achieve final compliance with the regulations by March 6, 1984..

After the necessary modifications to the drum incinerator the facility conducted stack tests on June 18, 1984 which was witnessed by the Agency. Results of the stack tests were submitted to the Agency and were deemed acceptable by Fred Smith.

The facility has submitted operating permit on August 16, 1983 for the drum reconditioning plant which includes the upgraded east side drum incinerator. The facility has not done any upgrading on the westside drum incinerator. The facility's operating permit was granted on September 7, 1984.

Prior to making an inplant inspection an area surveillance of the facility was conducted between 10:00 a.m. to 10:20 a.m. for odor and for visual observations of the stacks serving the eastside drum incinerator and reheat boiler. A slight odor was prevalent in the area. There were no visible emissions from the incinerator and reheat boiler stacks.

The following are the findings of the eastside drum incinerator which was in operation during the inspection:

1. The temperature settings on the drum incinerator were 1200°F primary chamber, 1200°F secondary chamber and 1600°F after burner. The temperature settings are identical to that during the stack test of June 18, 1984.
2. Actual operating temperatures were 947°F in the primary chamber, 1168°F in the secondary chamber and 1609°F in the afterburner.

The above readings were taken at 10:30 a.m.

3. The temperature chart recorder paper was missing and the recorder was shut down. This is a violation of Standard Condition #6 of the Operating Permit for failure to operate the temperature chart recorder on the drum incinerator and afterburner thereby making it difficult for the Agency personnel to determine compliance of the drum incinerator operations with the Illinois Air Pollution Regulations on a continued basis.
4. During the inspection the drums were being fed at a rate of 42 drums in five minutes.

During the inspection the facility had a malfunction which caused one of the burners in the primary chamber to go out causing the temperature in the primary chamber to drop and shutting off the green light. The green light is a signal for the operator to charge the drums to incinerator in a normal manner. If the green light is off it indicates caution for the operator while charging the drums and to reduce the drum loading to the incinerator. If the problem persists and if there is a potential of an emission problem then the red light will go on indicating to the operator to stop charging drums. During the malfunction only the green light went off and the afterburner's actual temperature remained above 1400°F while the maintenance personnel tried to correct the malfunction. There were no visible emissions noted during the malfunction of the drum incinerator. The problem was corrected in 10 minutes and the afterburner temperature reached the 1600° level. Since the malfunction had not caused any emission violations it will not be recorded on the malfunction recording chart as per Mr. Arnie Nehra.

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The temperature chart recorder is considered an integral part of the control system for the drum incineration operations. Without it being operated regularly, it is difficult for the Agency to determine compliance of the drum incinerator with Illinois Air Pollution Regulations on a continuing basis. The temperature chart recorder was installed after numerous discussions between the Agency and the company and was designed to provide temperature data on the drum incinerator and afterburner to show continuous compliance

The facility's drum incinerator was observed to be in compliance with Air Pollution Regulations with the exception of the temperature chart recorder not being operated.

A CIL is being sent to the Company for the following alleged violation.

Section 201.161:
and Standard #3 & #6
of the Operating Permit:

Failure to operate temperature chart recorder on the drum incinerator and afterburner continuously thereby preventing Agency personnel from evaluating the compliance status on a continued basis of the said operations with Illinois Air Pollution Control Regulations.

HN/gkw/0337A



Environmental Protection Agency

1701 First Avenue, Maywood, IL. 60153

September 20, 1984

CERTIFIED MAIL
P 13 3909645

Mr. Arnie Nehra
Project Engineer
Acme Barrel Company
2300 West 13th Street
Chicago, IL 60606

Re: ID# 031 600 ASD

Dear Mr. Nehra:

This inquiry concerns apparent noncompliance with the requirements of the State of Illinois Environmental Protection Act and 35 Ill. Adm. Code - Subtitle B, Chapter 1 - Air Pollution Control Regulations as observed on September 13, 1984. The apparent violation is as follows:

Section 201.161 and
Standard Conditions
#3 and #6 of Operating
Permit:

Failure to operate the temperature chart recorder on the drum incinerator and afterburner thereby preventing Agency personnel from evaluating the compliance status on a continuing basis of the said operations with Illinois Air Pollution Control Regulations.

You must submit in writing, within fifteen (15) days of receipt of this letter, the reasons for the apparent violation outlined above, as well as a description of the steps which have been initiated to prevent any further recurrence of the above-cited violation. This information should be sent to:

Mr. Harish Narayan
Illinois Environmental Protection Agency
Division of Air Pollution Control
1701 First Avenue - Suite 600
Maywood, Illinois 60153

Further, take notice that noncompliance with the aforementioned requirements may be the subject of enforcement action pursuant to the Illinois Environmental Protection Act, Ill. Rev. Stat., Ch. 111 1/2, Sec 1001 et seq.

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Should you need additional information or have any questions regarding the above, call Mr. Harish Narayen at 312/345-9780.

Sincerely,

Sy Levine, P.E.
Regional Manager
Division of Air Pollution Control

SL/HN/gkw/0335A

cc: Miles Zamco
Permit Section
Region 1 File-2



Environmental Protection Agency

2200 Churchill Road, Springfield, Illinois 62706

VISIBLE EMISSION RECORDING FORM

Company Name Acme Barrel		Company ID Number 03/600 ASD	Observation Date 9/13/84
Address 2301 W. 13th St. Chicago		Observer's Name HARISHA NARAYAN	
State IL	ZIP 60608	Phone 312/312-1234	Certified By City of Chicago Date 9/13/84
Source/Process Drum Incinerator		Time Start 10:10 AM Time Stop 10:15 AM	
Control Equipment Afterburner	Operating Mode Continuous		
Describe Emission Point Next Recycling Bunker Stack Round			
Emission Point Height Above Ground Level 60 ft.	Emission Point Height Relative to Observer 0		
Distance to Emission Point 600 ft.	Direction to Emission From Observer S.W.		
Describe Emission			
Color of Emission	Continuous Fugitive Intermittent		
Water Vapor Present No <input type="checkbox"/> Yes <input type="checkbox"/>	If Yes, Is Plume Attached Detached		
Point Where Opacity Was Determined Top of Stack			
Describe Background sky			
Color of Background Grey	Sky Condition cloudy		
Wind Speed	Wind Direction		
Ambient Temperature	Relative Humidity		
Layout Sketch of Source (Show North Arrow, Location of Sun, Emission Point, Wind Direction, etc.)		Range of Opacity _____ % to _____ % Number of Readings Above _____ % were _____	
		Comments Some solvent odor prevalent in the area, Some emissions observed from the back of the last incinerator rectangular stack. No emissions from the round bunker stack. The incinerator does not seem to be operating.	
Observer's Signature		Date 9/13/84	